

Internal Letter



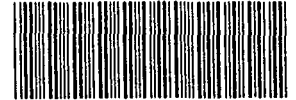
Rockwell International

Date . April 28, 1989

No. . WOIL.015

TO (Name, Organization, Internal Address)
 . R. C. Baker
 . Waste Compl. & Plns.
 . Bldg. 776

FROM (Name, Organization, Internal Address, Phone)
 . F. P. Lawton
 . Env. Mgmt.
 . Bldg. 250
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000025424

SUBJECT. PCB CONTAMINATED WASTE DRUMS

~~Discussions with Operational Health Physics have resulted in the following~~
 recommendations for the four (4) drums of PCB contaminated waste.

The two drums of liquid waste have been sampled and the analyses are currently underway for radioactive constituents at Acculabs. Upon receipt of the data, the test proposed in the draft rewrite of Chapter 21.01 (attached) will be used to evaluate the waste. This test is conservative and the evaluation will be described and submitted to DOE-RFAO for approval for offsite shipment of the PCB contaminated liquid waste, if it passes the test. If the waste does not pass the test, it will be considered low level waste.

The drum of capacitors will require smearing of the capacitors. It is assumed that they are dry and the smear will be as close to a 100% survey as possible. At least ten separate smears should be taken and counted in this 100% survey, not with a LUDLUM, but with an alpha counter, if the capacitors came from a plutonium area. If the capacitors came from a uranium area, then the smears should be counted on a model 31 "pancake" counter. In either case, any detectable activity will cause the material to be treated as low level waste and not available for incineration.

The drum of soft waste cannot be adequately tested for offsite shipment for radioactivity by any practical means. A census (100% survey) would have to be done of the waste in the drum and this is not practical. This drum should be considered low level. Since the soft waste came from the 800 area, the assumption that it would not pass the DOE mandated offsite shipment acceptance limit of zero measurable radioactivity is sound.

Once the data on the liquids and the smears are available, an approval letter, including DOE approval will be sent to you, if the waste liquids and capacitors are indeed nonradioactive.

F. P. Lawton
 Environmental Management

cc:
 F. D. Hobbs
 G. H. Setlock

ADMIN RECCRD

SW-A-002910